

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LUIS LONGHI,	:	CASE NO. 1:18-cv-08077
	:	Hon. Vernon S. Broderick
	:	
Plaintiff,	:	
	:	
v.	:	CROSS-NOTICE OF MOTION
	:	
LOMBARD RISK SYSTEMS, INC.,	:	Oral Argument Requested
A VERMEG LTD COMPANY,	:	
	:	
Defendant.	:	
	:	

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and Declaration of Jon W. Green (and exhibits thereto), and upon all prior pleadings and proceedings herein, the undersigned counsel for Plaintiff Luis Longhi, will cross-move this Court for an order pursuant to Fed. R. Civ. P. 15(a)(2) to file and serve a Second Amended Complaint; and for such further relief as the Court may deem just and proper.

Respectfully submitted,

Dated: January 11, 2019

/s/ Jon W. Green
Jon W. Green, Esq.
GREEN SAVITS, LLC
25B Vreeland Road, Suite 207
Florham Park, NJ 07932
Telephone: (973) 695-7777
E-mail: jgreen@greensavits.com
Attorneys for Plaintiff, Luis Longhi